



AT&T Relay CAs will not summarize conversation unless specifically instructed by the relay user. If the CA follows instructions to summarize, the CA will inform both parties that the call is being summarized.

The default for all relay calls is to relay (both type and read) verbatim. If ASL Gloss translation to correct spoken English is required, the CA will translate as requested.

Callers may also prefer to add instructions regarding “relay verbatim instead of translating” to their personal profile. This will ensure that CAs receiving the call will have this information in advance, and callers won’t need to inform the CA of this prior to placing their calls. CAs will translate the hearing person’s English back to the TTY user at a level the deaf person can understand.

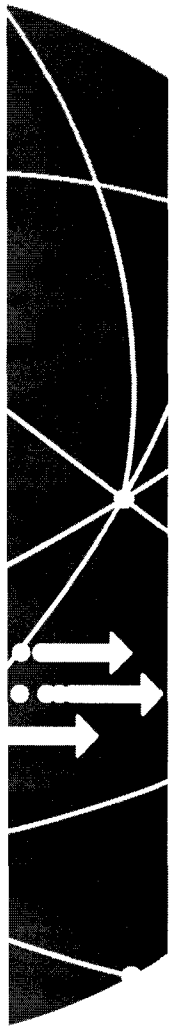
AT&T recognizes that the caller is in control of the call at all times and CAs will comply with all instructions or request to relay verbatim, to translate conversation, or to summarize the conversation. Our CAs receive extensive training on the absolute necessity of relaying without changing the intent of the communication process. If requested to summarize conversation, the CA will acknowledge the request and will inform both parties that the call is being summarized.

Retaining Information for Subsequent STS Calls

AT&T Speech-to-Speech CAs are trained to retain information from a particular call in order to facilitate the completion of consecutive calls, at the request of the user. The STS CA will retain this information only for as long as it takes to complete the subsequent calls. A STS user may ask the CA to store a message for a minimum of two hours or longer when the user knows additional calls will be placed at a later time. This makes communication easier for our STS callers as it eliminates the need for them to repeat the same information over and over.

STS Call Facilitation

When processing a Speech-to-Speech (STS) call, a STS CA is permitted to intervene and facilitate conversation to ensure successful communication between the STS user and voice/hearing person. The STS CA’s involvement in the call will be based on the facilitation role the STS user requests. The STS CA will “repeat all of the STS user’s conversation” or “only conversation that is not understood”. For convenience, STS users may include other call handling instructions in their Relay Choice Profile such as CA



instructions for announcing or explaining the service according to their needs. This will eliminate the need for the STS user to provide instructions on every call.

At AT&T, every CA understands the customer controls their call.

[illegible]

AT&T Response:

AT&T has read and meets this requirement.

AT&T CAs do not impose limits on the number of calls or the length of calls made. Our CAs are prohibited from refusing single or sequential calls, or limiting the length of calls utilizing relay services. With AT&T, the relay user is in control of their call at all times.

Our relay service is the only one that has Upfront Automation (UFA), a patented feature, which allows both TTY users and voice callers to directly enter the number they wish to call without having to provide it to the CA. This allows callers to spend less time communicating with the CA and more time communicating with the person they are



calling. While there are many advantages to using UFA, our relay platform still allows those users who prefer to communicate with the CA to do so.

Text to Voice / Voice to Text

A TTY user may request a relay call to a non-TTY user, also known as the Voice person. The CA voices the TTY user's typed conversation and then types verbatim, the Voice person's response back to the TTY user. A Voice person may request to place a relay call to a TTY user. The CA types the Voice person's conversation to the TTY user, and then relays the TTY user's typed responses back to the Voice caller.

Voice Carry-Over (VCO)

Voice Carry-Over provides people who can communicate with their voice but have difficulty hearing, the ability to place or receive calls. The VCO caller speaks his or her own message directly to the caller without such transmission being processed by the CA. The CA then types any conversation spoken to the VCO user so it can be read on the TTY. AT&T allows relay users to request VCO services without the normal TTY transmission that is typically required. A VCO user can connect voice and say "VCO" and we connect the call. Voice users do not hear tones during a VCO call.

We provide and support, both acoustic and direct connect modes, for callers who wish to use Voice Carry Over (VCO). VCO will always include the option to either use the TTY to enter the number to be called or to directly speak the number to the CA.

Our platform automatically establishes the carry-over bridge for customers profiled as VCO or HCO callers. Our relay platform will immediately set up the VCO feature when profiled VCO callers initiate a relay call or receive a relay call, whether they dial 711 or dial one of the designated toll-free numbers. No other relay provider offers this functionality.

VCO with Privacy

The CA will activate the VCO Privacy feature upon request. The VCO user's speech will be private and the CA will only hear what the voice person says so that he or she can type responses back to the TTY-VCO user.

Two-Line VCO

Two-Line VCO calls, also known as "voice translation," allows interactive communication between the TTY/VCO user and the Voice person that is conferenced in



by the TTY user. This call type provides a more “real time” conversation between the TTY/VCO user, who has some residual hearing, and the Voice person.

TRS callers can choose Two-Line VCO through selections in their customer profiles. The Two-Line VCO user needs two phone lines, one for the TTY connection and one for the Voice connection. The following is a brief outline of the call flow:

- The Two-Line VCO user dials 711 or TTY number for FRS
- Caller requests Two-Line VCO, and provides number to dial
- CA dials number provided, which is the Two-Line VCO caller’s own voice line telephone number
- Two-Line VCO user answers the incoming call from the Relay, and uses a local service’s conferencing feature to dial and add the person they wish to talk with on the phone
- During the call, the CA remains silent and types whatever the called party says back to the Two-Line VCO user

Reverse Two-Line VCO

Reverse Two-Line VCO is when the Voice person originates the call directly to the VCO user. With the Voice caller already on the line with them, the VCO user then dials the Voice number for the Relay Service, conferences CA on line, and has CA place a call to his/her TTY line. Once this call is set up, the CA’s function throughout the call is to type the Voice person’s conversation to the Two-Line VCO user.

VCO to Text / Text to VCO

This call type provides individuals who can communicate with their voice but have difficulty hearing, the ability to place or receive calls. The VCO user speaks his or her own message directly to the other person. The CA then types any conversation spoken to the VCO user, so it can be read on the TTY.

We provide and support, both acoustic and direct connect modes, for customers who wish to use Voice Carry Over (VCO). VCO will always include the option to either use the TTY to enter the number to be called or to directly speak the number to the CA.

Our platform automatically establishes the carry-over bridge for customers profiled as VCO users. Our relay platform will immediately set up the VCO feature when profiled



VCO callers initiate a relay call or receive a relay call, whether they dial 711 or dial one of the designated toll-free numbers. No other relay provider offers this functionality.

VCO-to-VCO

This relay call is also referred to as VTV. VTV is a relay call in which two VCO users who can speak, but cannot hear, are able to communicate with each other via the CA. During a VTV call, the CA types the TTY-VCO caller's spoken conversation to the other TTY-VCO user. The CA then types the spoken response of the forward TTY-VCO user back to the TTY-VCO caller.

VCO to HCO / HCO to VCO

This relay call allows two TTY users to communicate with each other via relay with one of the TTY users using VCO and the other HCO. During a VCO to HCO (VTH) call or HCO to VCO (HTV) call, the VCO customer voices his/her conversation to the HCO user. The HCO user types his/her response which is then retyped by the CA to the VCO user.

Hearing Carry-Over (HCO)

AT&T provides and supports both acoustic and direct connect modes for callers who wish to use Hearing Carry Over (HCO). This feature allows people who have difficulty speaking to place calls and receive calls. The HCO caller hears the communication directly from their caller without such transmission being processed by the CA. The CA then voices any conversation typed by the HCO user to the other party.

Our sophisticated Relay platform will automatically set up the HCO capability when profiled HCO users initiate a relay call or receive a relay call, whether they dial 711 or dial one of the designated toll-free 8YY numbers. No other relay provider offers this functionality.

HCO with Privacy

The Relay Operator will activate the HCO Privacy feature upon request and shall not be able to hear those portions of the call. During this call, the CA will relay the HCO user's type responses to the Voice person, but will not hear the Voice person's spoken conversation.

Text to HCO / HCO to Text



This is a relay call request in which both customers are TTY users, but one is hearing. The TTY-HCO user will type their conversation to the CA who will retype the text to the other TTY user. The CA will then voice the non-hearing TTY users typed response to the TTY-HCO user.

AT&T provides and supports both acoustic and direct connect modes for customers who wish to use Hearing Carry-Over (HCO).

Our sophisticated Relay platform will automatically set up the HCO capability when profiled HCO users receive a relay call or initiate a relay call, whether they dial 711 or dial one of the designated toll free numbers. **No other relay provider offers this functionality.**

HCO-to-HCO

This relay call is also referred to as HTH. Both customers are able to hear but cannot speak. The TTY-HCO caller types their conversation to the CA, who voices it to the other TTY-HCO user. The CA then voices the typed response of the other HCO user to the caller. During this call, the CA does not type to either customer.

Two-Line HCO

Two-Line HCO, also known as "Hearing Translation," allows interactive communication between the TTY/HCO user, who has some degree of voicing capability, and the Voice person that is conferenced on line by the TTY user. It provides a more "real time" conversation between the TTY/HCO user and the Voice person. During this call, the CA will facilitate the call based on instructions provided by the TTY/HCO user. If the HCO user does not advise the CA of their facilitation role, then the CA will not speak unless the HCO user types conversation.

Spanish-to-Spanish

We currently offer Spanish Relay for all States where we provide Relay Service. Spanish-speaking CAs shall be available 24/7/365 days a year to provide service for Spanish-speaking Relay callers. All CAs processing Spanish Relay calls are qualified to speak and write Spanish at a minimum 12th grade level as required. AT&T will provide Spanish-to-Spanish, English-to-Spanish, and Spanish-to-English Relay calls.



All call types processed through our English relay service are also available through our Spanish Relay. This includes TTY, VCO, HCO, ASCII, STS and 900 calls.

Speech-to-Speech (STS)

Our STS CA Team in Norton, Virginia is available 24/7 to assist STS customers. This team has the knowledge, experience, and skill set needed to serve the unique needs of the STS customer in a highly competent fashion. Further, our STS CAs have completed 40 hours of extensive STS specialty training that has further enhanced the CA's already-strong existing proficiencies.

We will provide a comprehensive STS Relay service through:	
•	Specially trained and highly skilled STS CAs with more than eight (10) years STS call processing experience
•	A dedicated toll free phone number
•	A dedicated and quiet STS environment
•	STS outreach and educational elements
•	STS marketing
•	Dedicated caller profile forms for STS callers

Calls Terminating to Answering Machine / Voice Mail

All CA positions are equipped with macro keys (pre-programmed messages) that are used when a recorded message is reached. AT&T CAs are trained to retrieve voice and TTY messages from voice processing systems and answering machines, and relay the message to the relay caller in the caller's communication mode (voice, TTY, ASCII, etc.). CA positions are also equipped with a Play Back Device (PBD) that enables the CA to capture recorded messages in their entirety without the need to redial. The CA has the ability to play back to any point in the recording, which allows the CA to provide continuous message transcription to the TTY user. All messages recorded on the PBD are erased as soon as the customer disconnects.

When a recorded message is reached, the CA uses macro keys to advise the TTY caller, "(recorded msg) (one moment pls) (and I will relay complete message)." The complete message is relayed and TTY caller is informed, "(beep...hung up... would you like to leave a message q) ga."



If the caller requests to leave a message, the CA redials and the complete message is left. The CA then advises the caller “(message has been left) (hung up) ga or sk.”

The following is a brief outline of the CA’s process for retrieving and leaving a message on an answering machine or voice processing system:

CA's Process for Retrieving and Leaving Voice Messages
1. PBD is activated to record message in its entirety.
2. CA uses macro keys to advise TTY caller, “(recorded msg) (one moment pls) (and I will relay complete message).”
3. Complete message is relayed and TTY caller is informed, “(beep...hung up... would you like to leave a message q) ga.”
4. CA redials to leave message.
5. Once message has been left, CA will advise, “(message has been left) (hung up) ga or sk.”

AT&T will not impose any charges for additional calls, if needed, in order to complete calls involving recorded or interactive messages. Callers are only billed for the final call when the message is left.

Another option for message retrieval is the Single Line Answering Machine (SLAM) procedure. This procedure is utilized when a TTY caller needs to check messages on the same line they are dialing from. The TTY caller may remain on the line while the messages are retrieved if the answering machine and TTY are located in the same room.

If the answering machine and TTY are located in a different room, the CA receiving the request will ask the caller to please hang up so that their messages can be retrieved. The CA then dials back to the number, enters the pass code or other necessary information provided by the caller, and retrieves messages. The CA, then calls back a second time and relays the messages to the customer. Callers are only billed for one complete call.

Pay-Per Calls

AT&T Relay CAs are very familiar with processing 900 Pay-Per Calls. Pay-per calls must be billed to the originating number, as alternate billing is not accepted for these calls. Pay-per call is available to all TTY users and will be processed in the customer’s preferred communication mode (i.e. TTY, VCO, HCO) without requiring the customer to dial a special access number for Pay-Per Call Service. When requesting to place a call to a 900 number, customers are always informed prior to call completion that there may be a charge for the call.



Call Release

AT&T will provide the feature that allows the CA to sign-off or be “released” from the telephone line after the CA has set up a telephone call between the originating TTY caller and a called TTY party, such as when a TTY user must go through a TRS facility to contact another TTY user because the called TTY party can only be reached through a voice-only interface, such as a switchboard.

Speed Dialing

AT&T offers a more extensive speed dial list than any other relay provider.

100 SPEED DIAL LISTINGS

Our Relay Choice Profile allows customers to enter up to **100 speed dial listings** in their Relay Choice Profile. This information is presented to the CA when they place a relay call. We provide Speed Dialing for our Relay users and offer an expanded speed dialing list size of 100 numbers.

Callers can then ask the CA to dial based on the name entered for that telephone number in the speed dial list such as “call mom” or “please call the dentist” or call “Charlie”.

Callers can also provide the number of the listing in their speed dial list such as call number 22. CAs then press a single key to have the telephone number entered from the caller’s speed dial list. **The CA does not need to manually copy the number over to the dialing field.** This eliminates the possibility of CA error in entering the number to dial.

ENHANCED SPEED DIAL OPTIONS

AT&T offers a number of enhanced speed dial options. Please refer to the sample speed dial list entry form below. This form expands as users enter information, allowing up to 100 speed dial numbers to be entered.



Speed Dials

ID	Name	Phone Number	Comm Mode	Familiar with Relay	Call Type	Special Instructions
1			Baudot	Yes	General	

MANY OPTIONS FOR COLORADO RELAY USERS

Relay users have several fields they can elect to complete for each of their speed dial listings. These fields include:

1. **Name** – Can be real name or nick name
2. **Phone Number** – Inclusive of area code
3. **Communication Mode** – Specifies communication mode of the person they are calling. This allows CA to set the call up appropriately prior to the phone being answered. Options include voice, baudot, Baudot VCO, Baudot HCO, STS, Turbocode, Turbocode VCO, Turbocode HCO, Ascii, or IM.
4. **Familiar With Relay** – Yes/No field. Indicates to the CA that they may be familiar with relay and CA won't need to ask- creating a more efficient call setup.
5. **Call Type** – Options include: General, Business, Personal, Financial, Social.
6. **Special Instructions** – This is a freeform field that allows the relay customer to enter special instructions such as "Ask for Mary" or "Please press two to retrieve messages" or other special instructions associated with that telephone number.

CALL BY NAME

In addition to speed dial listings, AT&T offers a "Call By Name" feature for STS users who may have difficulty conveying their complete phone number to individuals who may wish to call them. After profiling their "call name", a customer can ask the CA to dial it by saying "Call Suzie" or "Call Mr. Thomas". CAs type the call name in the appropriate field and our sophisticated relay platform automatically pulls up the persons telephone number to be dialed.



This feature, not available through all relay providers, assists our customers with highly-efficient call processing and is especially appreciated by our customers with speech disorders.

Basic Three Way Calling

AT&T has provided this feature for many years. Customers who have purchased the three-way calling feature from their LEC can dial in to reach one of AT&T's skilled CAs and they can then conference in an additional person on their three-way calling line. CAs will be able to communicate with both the caller and the third-party on the same line and will be able to type to the caller on the additional line (forward number). This three-way calling feature is available for use by all relay customers including our STS users who especially appreciate this feature.

Another option is for the caller to dial in to another relay connection with the forward number, allowing for an additional party to be joined on the line. Customers have the option to choose how to connect, either with another relay line or directly through their own connection.

Although three-way calling functionality has two customers on the line, end users and the state of Colorado are billed for just one relay call.

4.2.1.4 Handling of emergency calls. Providers must use a system for handling emergency calls that, at a minimum, automatically and immediately transfers the call to an appropriate member Service Area's Public Safety Answering Point (PSAP) or PSAP that the caller would have reached if he had called 911 directly. The system is capable of enabling the dispatch of emergency services to the caller's location in a timely manner.

AT&T Response:

AT&T has read and exceeds this requirement.

AT&T's emergency call handling procedures are compliant and in accordance with the FCC's mandates and requirements which stipulates that emergency calls be transferred to the most appropriate PSAP.



We encourage relay users to dial 911 directly; however, the Procedure for CA processing a 911 call is as follows:

Emergency Call Handling
1. CAs can directly access a database with emergency agency listings based on the caller's Automatic Number Identification (ANI). In the rare occurrence that the agency number doesn't appear in the database, the CA contacts Directory Assistance. After getting the number, the CA needs only two key strokes to immediately access the emergency agency.
2. Our Caller ID technology enables the emergency agency to receive the relay caller's ANI directly, eliminating the time and potential inaccuracy of number transmission by the CA.
3. When the agency answers, the CA informs the dispatcher that the call is coming through Relay Service, provides their CA number, and indicates whether the caller is TTY or voice. The CA then remains available to the emergency agency to provide any information or assistance to support emergency service. The call is given the CA's undivided attention – call transfer is strictly prohibited – and a supervisor is typically summoned to provide support to the CA until the call ends when the agency disconnects.
4. Emergency calls are treated differently from a confidentiality perspective. CAs are trained and prepared to provide any and all information requested to the PSAP agency to ensure the relay caller receives expeditious emergency services. These may include the Billing Telephone Number (BTN) and any information stated by the caller before connection, etc. It is our goal to get the caller assistance as quickly as possible.

AT&T CAs notify their supervisor and solicit the supervisor's support when processing Emergency calls.

AT&T's emergency call-handling procedures explicitly instruct the CA to contact the PSAP agency if a caller disconnects from Relay prior to reaching the emergency agency. CAs contact the PSAP and provide them with the caller's telephone number and other pertinent information shared by the caller prior to disconnection. Quick action by our CAs has made the difference between life and death for some of our relay callers.

CAs are trained to stay on the line with emergency calls as long as required to ensure that emergency services are rendered. CAs will stay on the line until the PSAP hangs up or



tells the CA to drop the line. Transferring of emergency calls to other CAs is not permitted.

When receiving a call that a CA suspects may be an emergency, the CA will treat that call as an emergency call. AT&T CAs will not attempt to question the caller about the exact nature of the emergency, other than to determine whether fire, police, or ambulance is required. CAs will let the professionally trained PSAP Operator question appropriately deal with the emergency.

AT&T will train all CAs and Supervisors to process emergency calls. Following are our procedures for processing 911 Emergency calls:

911 Emergency Call Processing	
Get assistance:	<ul style="list-style-type: none">• Relay customers may use our service to get Emergency assistance If you receive a call that: <ul style="list-style-type: none">• Arrives on the Emergency DNIS (shown in upper left corner of screen).• Is identified by the Caller as an "emergency" or "911".
Position tool:	<ul style="list-style-type: none">• You'll see emergency call under the red "Emergency Tab" in the Position Tool.
Determine required Info:	<ul style="list-style-type: none">• While waiting for a supervisor to assist, carefully review your screen to determine what information is provided. The information listed below is required to get emergency assistance for the caller. If the caller or the system has not provided this information, ask (by speaking if voice, by typing if TTY) the caller for the following:<ul style="list-style-type: none">- Nature of Emergency (police, fire, ambulance)- NPA/NXX (area code and prefix) to access CSIDS (Note: phone number may be on screen)
Process call:	<ul style="list-style-type: none">• After getting appropriate information from the caller, process the call as indicated below.
Access Call Database:	<p>After getting appropriate caller information process the call as follows:</p> <ul style="list-style-type: none">• Press F5 (info key) to access Call Information Database.• Press E for emergency file.• Enter NAPNXX (area code & first three numbers of phone number).



- * Press Shift + Continue (Enter)
- * Press the letter that corresponds to correct city (press Ctrl 5 for additional options).
- * If more than one listing, ask caller what city or town.
- * Press CTRL + B and enter number for emergency agency in FWD field on billing window.

Reminders:

- * Comply with emergency dispatcher's inquiries; provide any information requested to render emergency services.
- * If Call Information Database doesn't have correct number to dial, call directory assistance to get appropriate number.
- * If caller hangs up before emergency agency is reached, process call and share details with dispatcher. Inform dispatcher that caller has hung up.
- * If Voice caller needs 911, Press C/O key (F7) and select STS before dialing. This will allow Voice person to talk directly to emergency dispatcher.

A fully automated ("electronic") system to handle emergency services for each call type is not currently trusted or used by AT&T. AT&T Relay's emergency call handling system has been optimized over the years to support the wide variety of call types handled through the platform with concierge care and accuracy. Since Relay call types vary significantly (e.g. POTS lines, wireless phones, payphones, voice users, data users, STS users, and wireline TTYs), this optimization comes in the form of a CA determining the most appropriate handling method for each E911 instance. A more automated system is trusted and used for AT&T IM/IP users.

4.2.1.5 In-call replacement of CAs. CAs answering and placing a TTY-based ERS or RLS call must be able to handle a request for a transfer. A CA answering and placing a call to a TTY-based key will be called by a minimum of three transfers.

AT&T Response:

AT&T has read and meets this requirement.

As a matter of practice, AT&T minimizes transfers and reliefs to the extent possible. AT&T CAs only transfer calls when necessary. A change never takes place until either



the calling or called party has completed their part of the conversation (typed or stated GA). Prior to transferring, CAs will ensure that they have been processing a call for a minimum of ten (10) minutes for traditional relay and fifteen (15) minutes for Speech-to-Speech Service. The only exception is when a customer requests to be transferred to a different CA. Requests for the same CA to relay the entire conversation will be honored whenever possible.

When it is necessary to transfer a relay call, AT&T's sophisticated relay platform allows for a fully electronic transfer of the call. This takes only seconds and is done at not-intrusive junctions on a call that has already met minimum time requirements. Other relay provider platforms do not have the ability to transfer a call electronically. A manual relieve takes much longer to occur given that CAs must change seats and plug in new headsets before assuming the call. Our electronic transfer ability allows for full transition of the call including any notes indicated by the CA in their scratchpad for processing of the call. This is a highly efficient process that does not disrupt the call underway.

Due to the complexity of Speech-to-Speech calls, CA reliefs are "manual" reliefs only. The relief STS CA will go to the CA position to complete the remainder of the call.

When a call is transferred to a relief CA, TTY customers are notified by the macro bearing the relief CA's identification number and gender. Voice customers are notified by the announcement, "relief ca XXXX continuing your call." These notifications are provided promptly when the call is transferred, which takes place only at non-disruptive junctures between the TTY and Voice parties' conversation.

4.2.1.6 CA gender preferences. TTS providers must make best efforts to accommodate TTS user's request for CA gender when a call is initiated and the transfer occurs, and when the call is transferred to another CA.

AT&T Response:

AT&T has read and meets this requirement.

AT&T recognizes that relay users may desire a CA of a specific gender to relay their call. We have been accommodating gender requests for many years and will continue to make our best effort to honor all requests. Call transfers for gender accommodation, and other



transfers are smooth and non-intrusive for the customer. Our electronic call transfer process is efficient and easy for our CAs as well.

TRS user requests specific CA Gender

When the TRS user requests a specific gender, the CA will type or say:

"Please hold while I check to see if a male/female CA is available"

If the requested gender CA is available, the CA will inform caller,

"Thank you for holding. We are able to accommodate your request. I am transferring your call now. One moment please."

The CA will **electronically** transfer the call to the relief CA of the requested gender.

When the call is transferred to a relief CA, the TTY user will be notified and see a message (macro key used) showing the relief CA's identification number and gender:

(relief ca XXXX M/F)

Voice customers are notified by the announcement "relief ca XXXX continuing your call."

These notifications are provided promptly when the call is transferred in a non-disruptive manner. The TRS user can then commence their conversation with the CA of their requested gender.

Call Details stay with the transferred call

During call transfers, call detail information that has been provided by the TTY user and the Customer Profile information remain available to the relief CA.

AT&T has a sophisticated relay platform that allows for an expedient and fully-electronic transfer of relay calls to a relief CA. Other relay providers platforms may not have this electronic functionality.

AT&T CAs only transfer calls when necessary. As shared above, prior to transferring a call, CAs will ensure that they have been processing a call for a minimum of ten (10) minutes for traditional relay and fifteen (15) minutes for Speech to Speech Service. The



only exception is when a customer **requests** to be transferred to a different CA – as in requests for CA gender accommodation.

4.2.1.7 STS called numbers. Relay providers must offer STS users the option to select from a list of relay center a list of names and telephone numbers, which the STS user calls. When the STS user requests one of these numbers, the CA must provide the name and telephone number to the STS user. This information must be relayed to the STS user prior to dialing the number.

AT&T Response:

AT&T has read and meets this requirement.

STS users have the option to maintain a list of frequently called numbers through the AT&T Relay Customer Profile. The AT&T Relay Customer Profile allows STS users the ability to create a list of **over 100 frequently called number** which can be arranged in alphabetical order of the first name, with each entry having a number with the first entry assigned the number one and the number of each subsequent entry increasing one (1, 2, 3, 4...). Whenever a STS user elects to place a call to an entry in their Relay Customer Profile, the CA will state the name and number of the requested person to the STS user prior to dialing the number.

4.2.2 Additional Colorado Operational Standards

4.2.2.1 Standard Relay Product Features. The State and TRS will require that all services listed in Appendix B to be standard features. Offerors must indicate which of these services they provide and the prices for each. Offerors must also indicate which of these services they do not provide. To facilitate comparison, offerors should review the list of features and indicate which services they provide in an identical fashion, which they provide in a different fashion and which they do not provide at all. Offerors should also indicate which services they would provide as standard features, but are not required to provide.



AT&T Response:

AT&T has read and meets this requirement.

Please see Appendix 3 for our demonstration of providing the required standard product features.

4.2.2.2 Placing Calls. Calls will adhere to the FCC rule requiring 85% of all calls to be answered within ten seconds by any method which results in the TPS caller's call being answered. Calls that are not put in a queue will be called.

Calls to the relay service are placed on hold. They will not be on hold longer than one minute. Calls are placed as soon as they call. They will receive immediate priority over other calls and support services. The process is: Public Safety Answering Point (PSAP).

AT&T Response:

AT&T has read and will comply.

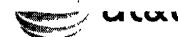
We utilize a proprietary system called "Upfront Automation" which allows a user to immediately begin entering call details and/or the number they wish to call as soon as they are connected with the relay service. The call is then sent to the first available CA for processing. It is rare occasion when a caller is placed in queue. As stated in our response to Section 4.1.2, we have a track record of exceeding the FCC rule that requires 85% of calls to be answered within ten seconds. We normally achieve an average of over 98% of our state relay calls answered within ten seconds as reflected in the following chart.

File Source: Answer Performance Summary Report

Contract	October 2011 - % Service Level Performance																																
	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19	20	21	22	23	24	25	26	27	28	29	30	31		
	S	S	M	T	W	T	F	S	S	M	T	W	T	F	S	S	M	T	W	T	F	S	S	M	T	W	T	F	S	S	M		
AT&TLD	100	99	97	95	99	100	100	100	100	100	99	99	99	99	100	99	100	99	99	100	99	100	100	99	98	99	99	99	100	100	100		
AT&T1	98	96	91	91	97	97	99	99	99	100	97	95	90	94	99	95	95	94	96	99	97	100	98	98	93	96	96	96	98	100	100		
AT&T2	99	96	92	89	94	95	99	98	99	100	96	93	89	94	98	95	92	94	95	99	96	99	98	97	92	96	95	95	98	99	100		
AT&T3	99	99	99	99	99	100	100	100	99	100	100	99	99	100	100	100	100	100	100	100	100	100	98	99	100	100	99	99	96	99	100		
AT&T4	95	100	97	100	98	100	100	100	100	100	100	100	98	100	100	100	100	100	100	100	99	98	97	100	99	100	100	95	99	95	100	100	
OSD	99	98	98	99	98	98	100	100	100	100	100	99	95	97	100	100	100	99	99	100	99	100	100	99	95	99	97	92	100	100	100		
	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19	20	21	22	23	24	25	26	27	28	29	30	31	ASA	
	S	S	M	T	T	T	F	S	S	M	T	W	T	F	S	S	M	T	W	T	F	S	S	M	T	W	T	F	S	S	M		
AT&T5	0.2	1.2	3.1	3.9	1.5	0.7	0.4	0.2	0.4	0.9	0.8	2.7	7.3	0.9	0.3	1.2	0.3	1.0	0.6	0.2	0.8	0.4	0.5	0.7	0.7	1.2	1.8	0.7	0.3	0.2	0.2	1.2	
AT&T Span	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.1	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	

January

These are actual results from October 2011 which considered normal month with 5 weekends and no holidays. The actual state name has been protected.





The contract labeled "AT&T 5" has a more stringent answer requirement where all calls must be answered within 3 seconds. As illustrated on the chart provided, we averaged a **1.2 second speed of answer for all calls in the month of October 2011.**

AT&T has a feature which allows for reverse 9-1-1 priority routing of relay calls. This allows calls from emergency dispatchers who have a need to call back to a relay user, to have their calls receive immediate priority over other calls.

We also comply with FCC rules that require any internet based relay user who requests an emergency call to 9-1-1 to have their call receive priority routing over other calls allowing the call to be connected to the nearest 9-1-1 Public Safety Answering Point (PSAP).

4.2.2.3 Relaying the full content of communication. CAs must convey the full content of a call, including the intent of the communication, to the intended recipient. CAs shall not delete or alter the content of the communication, including any profanity or other content that may be considered offensive. For example, if a caller types in parentheses, the CA should relay the content as being humorous or laughing, or if the caller is crying, the CA should relay the content as being emotional. CAs shall also keep the user informed of the status of the call, such as if the call is being disconnected, on hold, or explaining the delay to a holding caller. When a system user is a TTY user, the CA shall adopt a conversational tone of voice appropriate to the situation, such as being made. CAs shall indicate to the TTY user if another person is speaking, such as the time. CAs shall also announce to both parties to the call when there is a change of operators during a call.

AT&T Response:

AT&T has read and meets this requirement.

AT&T CAs will convey the full content, context, and intent of all communication. Colorado Relay CAs will relay verbatim unless requested otherwise by the caller and/or recognized by the relay CA as an ASL call requiring translation. Our CAs receive extensive training on the absolute necessity of relaying verbatim without changing the intent of the communication process.

Informing TT User of Voice Person's "Tone of Voice"



AT&T CAs let the TT user know the non TT user's tone of voice whenever possible. Our CAs describe the person's tone of voice based on concrete sounds. They are trained to put this type of information in parenthesis to the TT user. Acceptable descriptions would include, for example, (sounds mad speaking very loud), (sounds happy laughing), or (sounds impatient sighing talking to someone else). This ensures that the TT user understands the tone of voice being used by the voice person on the call.

CA Relays With Appropriate Conversational Tone

AT&T CAs adopt conversational tones for intonation, content, and spirit. We require our CAs to sign a Code of Ethics statement which includes "CAs will convey the content and the spirit of the speaker." We train CAs extensively on these skills. We use role-playing during initial and subsequent training to help CAs develop an appropriate conversational tone of voice and pace so they read with intonation and fluency. We train our CAs to use an appropriate tone for the subject matter being discussed on a relay call. TTY users always have control of the call and, if necessary, may request a CA to use a different tone while relaying.

Call Status

AT&T uses macros (pre-programmed keys) to provide the quickest and most efficient process for informing Relay callers of the progress of their calls. Our list of macros includes more than 30 phrases in both English and Spanish to notify callers of a wide variety of circumstances affecting call progress, e.g. (ringing 1), (number busy), (holding), (hung up), (waiting to select your menu option), (entering numbers now please hold). We will gladly provide a full list of our macros at your request.

For situations not covered by our automated messages, CAs will manually type the information to the TTY user. CAs will also keep Voice customers informed of causes for apparent delay, such as, "Your caller is still typing."

We train our CAs to keep the caller informed throughout periods of holding. CAs focus on their call and will follow any instructions typed by the TT user while holding for the hearing person to return to the line.

AT&T CAs inform the TTY user any time a different person (hearing) comes on the line. This includes the gender of the voice/hearing person. CAs provide the Relay Announcement Phrase including their CA ID number to every different person that comes on the line.



If it is necessary for the originating CA to be relieved of the call, the relief CA will notify both parties of the relief and will provide their CA ID and gender.

4.2.2.4 Prohibited communications. CAs shall not counsel, advise or interject personal opinions or additional information into any relay call. This also includes CAs who shall not make any value judgments on the objectivity of any messages. Furthermore, CAs shall not conduct personal conversations with anyone, including their immediate family members. All contributions to any relay conversation must adhere to the standard

AT&T Response:

AT&T has read and meets this requirement.

AT&T CAs do not counsel, advise, or interject personal opinions or additional information into any relay call. CAs are explicitly trained to be neutral and non-participative in all relay conversations, as specified in the **CA Code of Ethics**. They are also trained not to release any personal information about themselves or other relay center employees. If a customer (usually a customer new to relay) persists in attempting personal conversation, CAs are trained in strategies to avoid conversation in a courteous fashion.

AT&T CAs do not make judgments regarding legality or obscenity of the content of a relay call. AT&T CAs understand that they are transparent conduits and they relay calls verbatim regardless of the content.

AT&T CAs will convey the full content, context, and intent of all communication. Colorado CAs will relay verbatim unless requested otherwise by the caller and/or recognized by the relay CA as an ASL call requiring translation. Our CAs receive extensive training on the absolute necessity of relaying verbatim without changing the intent of the communication process.

4.2.2.5 Preserving confidentiality. Proposals shall specify the policies and procedures that will be used to preserve confidentiality. Such policies may include measures to ensure that CAs are encouraged to use a private communication channel for relayed conversations and to implement policies to those who have confidentiality rights or obligations. Such policies shall specify the policy for handling violations of confidentiality.



AT&T Response:

AT&T has read and meets this requirement.

AT&T has a strong corporate history of protecting customer privacy and customer information. Protecting customers and honoring their privacy is a value that is deeply embedded in all we do, in every job performed at AT&T. Our corporate guidelines for business ethics and behavior, called the **AT&T Code of Business Conduct**, specifically cite protection of customer information and privacy as a paramount responsibility of every employee. We re-train and re-commit every AT&T employee every year regarding the confidentiality of our customers' information; all our employees serving relay callers make this commitment.

AT&T is proud of a record that is clear of any allegation of confidentiality breach. AT&T views any breach of confidentiality as an extremely serious matter. An AT&T CA or supervisor who after a thorough investigation is found to have violated the confidentiality rules and regulations will either be terminated immediately or given a disciplinary warning, depending on the severity of the violation. In the event of a second occurrence, we will immediately terminate the employee.

4.2.2.6 Spanish-to-Spanish calls. In view of Colorado's significant Hispanic population, English-to-English and Spanish-to-Spanish as well as English-to-Spanish and Spanish-to-English translation as standard features 24/7 365 days a year through our bilingual call center located in San Antonio, Texas. To be apply for a position as a bilingual AT&T CA, the applicant is required to meet all of our standard pre-hire screening and testing requirements and then must also pass one of the highest and most rigorous language screening tests in the industry. The bilingual CAs are tested prior to their employment and are further evaluated during initial training in order to ensure

AT&T Response:

AT&T has read and meets this requirement.

AT&T will offer relay services in English and Spanish as required. We will offer English- to- English and Spanish-to-Spanish relay, as well as English-to-Spanish and Spanish-to-English translation as standard features 24/7 365 days a year through our bilingual call center located in San Antonio, Texas. To be apply for a position as a bilingual AT&T CA, the applicant is required to meet all of our standard pre-hire screening and testing requirements and then must also pass one of the highest and most rigorous language screening tests in the industry. The bilingual CAs are tested prior to their employment and are further evaluated during initial training in order to ensure



they are able to meet the specific needs of the Spanish-speaking Relay community. Once qualified as a fluently bilingual CA, they must first complete and successfully pass all prerequisites of our English-speaking CAs (i.e. typing, training, proficiency assessments, etc.) which is then followed by a specific 4 hour training dedicated to relaying in Spanish and the culture and unique characteristics of deaf Hispanics.

All call types processed through our English relay service are also available through our Spanish Relay. This includes TTY, VCO, HCO, ASCII, STS and 900 calls.

4.2.2.7 Internet relay calls. The technical capability exists for TTY users to make calls using the Internet instead of regular phone lines. However, there are several unresolved issues that remain. These issues must be resolved at the national level before Internet relay calls can be processed and paid for appropriately at the state level.

AT&T Response:

AT&T has read and meets this requirement.

AT&T understands the regulatory authorities have not yet resolved the jurisdictional and financial issues pertaining to Internet Relay Services. **AT&T will offer, but not bill the State of Colorado for a Colorado IM Relay Service.**

We are proud of the IP Relay Service, also known as Instant Message Relay Service, we have developed with our talented IT Relay engineers. Please see the description of our Internet Relay offering for the TRS users in Colorado:

IP Relay Service

AT&T not only has the capability of providing internet relay – **WE INVENTED IT** and we have the patents to prove it. It was AT&T who first introduced IP Relay to the relay industry back in Portland, Oregon at the National Association of State Relay Administrators conference held in October 2000. One of the inventors of IP Relay is the current Director of the engineering and technology team that supports our relay service.

Currently, the IP Relay Service we provide is through AOL's Instant Messenger Service ("AIM"). **If requested by the State of Colorado, we would be happy to provide a branded buddy for Colorado Relay.** Additionally, we would work closely with the State and the Advisory Board on developing a specific report for Colorado.



Our IM Relay Service has features that are not available through any other relay provider. For example, the AT&T IM Relay Service provides:

- **Real Time IM Relay.** Instead of getting blasts or chunks of typed message, Real Time users will get word for word transmission providing a more even and smoother flow of conversation.
- **Font Size:** Ability to change font size to meet user preference
- **Voice Mail Retrieval:** Obtain Voice Mail messages left on the user's IM account
- **CALL HISTORY:** History feature which allows users to view history of recent calls placed and received

AT&T will include all of these features as part of the Colorado Relay IM Service as a standard feature, at no cost to the State of Colorado.

4.2.2.8 CA community contacts. Call center shall propose a method for a relay user to identify a CA's contact information in the event a complaint is filed for a user who is unable to contact the CA. A CA's proposed in-state center shall describe how they will ensure the CA's contact information is maintained to possible contact subject or the provision of contact information to the relay user for member of the staff and hearing impaired community. The CA shall ensure.

AT&T Response:

AT&T has read and meets this requirement.

AT&T does not plan an in-state center as part of its proposal and therefore, the possibility of social contact with our CAs and breach of confidentiality is almost non-existent.

AT&T has an established process for receiving and resolving customer inquiries, contacts and complaints. Customers can identify every CA by the CA ID and gender provided on every relay call.

Each CA has a unique number assigned to them at the start of their employment with AT&T Relay. AT&T is able to quickly identify any CA to praise, or coach as required. . Additionally, with AT&T's sophisticated tracking and reporting system, we have the ability to determine the CA who handled/processed a call even without the CA



number as long as the relay user is able to provide other specifics such as calling or called telephone, date and approximate time of call.

AT&T has always placed a strong emphasis on customer privacy, protection and customer confidentiality. Confidentiality and customer protection is at the forefront of our corporate ethics and values. Confidentiality of Relay Service is as strong a priority for AT&T as it is for the Colorado Relay users.

AT&T recognizes Colorado Relay callers must know their confidentiality and privacy is protected at all times. When a CA or manager is hired by AT&T, **we require all AT&T CAs and managers sign and comply with a Pledge of Confidentiality and a CA Code of Ethics.** We emphasize the critical nature of confidentiality, adherence to FCC regulations, and State contractual requirements in our training and coaching discussions. The Pledge of Confidentiality is posted in each Relay Center. The CA Code of Ethics and Pledge of Confidentiality are regularly reviewed as part of CA performance plans. These codes have served to underscore the importance of customer privacy and protection.

We are proud to share that in over 23 years in the relay community we've never received a concern about CA confidentiality. AT&T is proud of a record that is clear of any allegation of a breach of confidentiality.

AT&T views any breach of confidentiality as an extremely serious matter. Albeit rare and unlikely, a CA or supervisor who after a thorough investigation, is found to have violated the confidentiality rules and regulations will either be terminated immediately or given a disciplinary warning, depending on the severity of the violation.

4.2.3 FCC Technical Standards

4.2.3.1 ASCII and Baudot. TRS shall be capable of communicating with ASCII and Baudot format at any speed currently in use.

AT&T Response:

AT&T has read and meets this requirement.



We use Ultratec™ modems exclusively. These modems were designed in joint cooperation between Ultratec™ and AT&T Bell Laboratories to meet the stringent AT&T data transmission quality requirements. By partnering with Ultratec™, the industry leader in ASCII/Baudot modems, attributes such as TurboCode® become available to our customers immediately after introductions. AT&T relay centers are equipped and capable of handling any modem speed generally in use.

AT&T's Relay platform automatically detects the customers mode of communication (turbocode, baudot, ascii) and connects appropriately so that communication can occur.

AT&T has a long and successful relationship with Ultratec, the industry leader in manufacturing and providing ASCII/Baudot modems. This partnership enabled us to be the first relay provider to provide enhanced modalities like TurboCode® and the "interrupt" capability to all our customers across all our contracts. We did this without incidental charges that would "nickel and dime" our state customers. AT&T will continue to explore opportunities to enhance the communication modalities of TTY users and relay users to improve their relay call experience and move them closer to functional equivalence.

Our Ultratec modems support the auto-detect feature which lets them switch back and forth between TurboCode and TTY modes as necessary. The modems auto-detect the end user's equipment for TurboCode; if Turbo Code is found, we automatically connect in TurboCode to the relay user.

4.2.3.2 Speed of answer. AT&T providers shall ensure adequate TTS facilities sufficient to provide service to all TTY and TDD users under projected calling volume. The number of providers shall be sufficient to ensure that TTS facilities shall be functionally equivalent to the service provided by a voice experience in attempting to reach a party through a telephone network. TTS facilities shall, except during network failure, answer 85% of all calls within 30 seconds only by any means which results in the callers call immediately transferred to a person in a queue or on hold. The on-screen reading of the time to reach a person shall be the TTS facility. AT&T facilities shall ensure that adequate resources are available to ensure that a function with TTS use that could potentially cause a delay in the program shall not cause an expense due to lock from congestion shall be functionally equivalent to what a voice caller would experience in attempting to reach a party through a telephone network.